

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
PAUL K. VACCARELLI	:	<u>VIOLATIONS:</u>
	:	18 U.S.C. § 2251(a)
	:	(use of a minor to produce visual depictions of sexually explicit conduct - 2 counts)
	:	18 U.S.C. § 2252A(a)(5)(B)
	:	(possession of child pornography - 1 count)
	:	Notice of additional factors
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

In or about June, 2002, in East Lampeter Township, Lancaster County, in the Eastern District of Pennsylvania, defendant

PAUL K. VACCARELLI

knowingly used, persuaded, induced and enticed a minor, M.M., to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, using materials that had been mailed, shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a).

COUNT TWO

THE GRAND JURY CHARGES THAT:

Between in or about February, 2004 through in or about May, 2004, in East Lampeter Township, Lancaster County, in the Eastern District of Pennsylvania, defendant

PAUL K. VACCARELLI

knowingly used, persuaded, induced and enticed a minor, K.S., to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, using materials that had been mailed, shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 22, 2004, in East Lampeter Township, Lancaster County, in the Eastern District of Pennsylvania, defendant

PAUL K. VACCARELLI

knowingly possessed books, magazines, periodicals, film, videotapes, computer disks and other material that contained images of child pornography that had been mailed, shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Sections 2251(a) and 2252A(a)(5)(B), set forth in this indictment, the defendant

PAUL K. VACCARELLI

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations of Title 18, United States Code, as charged in this indictment, including, but not limited to:

1. The computer, an Apple E-Machine, model T1801, serial number QCG17E0007842;
2. His vehicle, an Isuzu Axiom, VIN 4S2DF58X934601455 and bearing PA Registration ESS-8697; and
3. All visual depictions seized on May 22, 2004.

All pursuant to Title 18, United States Code, Section 2253.

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

In committing the offenses charged in this indictment, defendant PAUL K. VACCARELLI:

1. involved a victim who had not attained the age of sixteen years, as described in U.S.S.G. § 2G2.1(b)(1);
2. possessed these materials as a result of his use of a computer, as described in U.S.S.G. § 2G2.4(b)(3);
3. possessed material that portrayed sadistic and masochistic conduct and other depictions of violence, as described in U.S.S.G. § 2G2.4(b)(4);
4. possessed 600 or more images, as described in U.S.S.G. § 2G2.4(b)(5)(D).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY